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7 *Attorneys for Plaintiffs*

8
9 **UNITED STATES DISTRICT COURT**
EASTERN DISTRICT OF CALIFORNIA

10 KATHERINE ROBLES, an individual;
11 and H.R., by and through his guardian ad
litem Katherine Robles,

12 Plaintiffs,

13 v.

14 CITY OF ROSEVILLE, a Municipal
15 Corporation; OFFICER DEAN RIANO,
in his official and personal capacity;
16 OFFICER SETH ADDINGTON, in his
official and personal capacity;
17 SERGEANT CHRISTOPHER CIAMPA,
in his official and personal capacity; and
18 DOES 1-20, inclusive, individually,
jointly, and severally,

19 Defendants.

20 Case No. 2:22-cv-00085-DC-SCR

21 *Hon. District Judge Dena Coggins*

22 **JOINT EXHIBIT LIST**

23 Date: November 14, 2025
Time: 1:30 p.m.

24 Pursuant to this Court's Orders (Dkt. 49, 53) and Local Rule 281, the parties submit
25 their list of anticipated exhibits at trial. As noted in the parties' joint pretrial statement, the
26 parties respectfully request leave to amend or supplement their exhibit lists prior to trial.

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Ex. #	Description	Date Identified	Date Admitted
Joint Exhibits			
JX-1	<u>Incident Report (DEF 9-40 and 109-124)</u>		
JX-2	<u>Use of Force Report (DEF 53-60)</u>		
JX-3	<u>CAD Report (DEF 106-108)</u>		
JX-4	<u>Photographs of Plaintiff (DEF 1806-1828)</u>		
JX-5	<u>5/12/21 Superior Court of California, County of Placer Criminal Minutes (PLT 2552)</u>		

Ex. #	Description	Date Identified	Date Admitted
Plaintiffs' Exhibits			
1	Profile Nail Salon surveillance video recording of incident		
2	Police reports regarding incident (DEF 00009-00040, 00053-00060, 00109-00124)		
3	Photographs of Plaintiff Katherine Robles after incident (some produced by Plaintiffs in 5/12/22 initial disclosures, not bates-stamped; DEF 1806, 1812-1813, 1816-1818)		
4	Plaintiff Katherine Robles criminal court records (PLT 002552-002555)		
5	Plaintiffs' medical records (DEF 003266-003412, 003464-003936, 003949-004598, 004894-004987, 005285-005568)		

Ex. #	Description	Date Identified	Date Admitted
Defendants' Exhibits			
A	911 Audio Recording (DEF 125)		
B	Dispatch Audio Recording (DEF 126)		
C	Audio Recording of Interview with Plaintiff Katherine Robles and Sgt. Pratt (DEF 1800 and 1803)		
D	Audio Recording of Conversation between Plaintiff Katherine Robles and Sgt. Ciampa (DEF 1804)		
E	Plaintiff Katherine Robles' records from South Placer County Jail (DEF 1871-1875 and 1830-1844)		
F	Plaintiff Katherine Robles' medical records from WellPath (DEF 1846-1867 and 5515-5559)		
G	Synced Security Footage from Profile Nail Salon (8 videos)		
H	Non-synced Security Footage from Profile Nail Salon (8 videos)		
I	Security Footage #8 with Enhanced Audio (From McFarlane)		
J	Security Footage #8 with Magnify (From McFarlane)		
K	Security Footage #8 with Audio Not Enhanced (From McFarlane)		
L	Security Footage #8 Use of Force Slow Motion (From McFarlane)		
M	Security Footage #8 Footage Short Enhanced Audio (From McFarlane)		
N	Robert McFarlane Expert Report (34 pages)		
O	Robert McFarlane CV		
P	006 Critical Images from McFarlane (463 pages)		
Q	007 Critical Images Magazine Throw from McFarlane (20 pages)		
R	Letter of Exhibits from McFarlane (3 pages)		
S	David Blake Expert Report (78 pages)		
T	David Blake CV		
U	Dr. Geofrey Desmoulin Expert Report (80 pages)		
V	Dr. Geofrey Desmoulin CV		
W	Dr. Elliot Henderson IME Expert Report (2 pages)		
X	Dr. Elliot Henderson Record Review Report (39 pages)		
Y	Dr. Elliot Henderson CV		
Z	Dr. Kimberly Miller Record Review Report (23		

1	pages)		
2	AA Dr. Kimberly Miller CV		
3	BB Dr. David Seidenwurm Presentation (23 slides)		
4	CC Dr. David Seidenwurm Report (5 pages)		
5	DD David Seidenwurm CV		
6	EE Dr. Steve McIntire's Report (183 pages)		
7	FF Dr. Steve McIntire's CV		
8	GG Derrick Olzack Rule 26 Letter (3 pages)		
9	HH Derrick Olzack's Evaluation of Past Medical Billing Report (14 pages)		
10	II Derrick Olzack's Evaluation of Past Medical Billing – Howell (18 pages)		
11	JJ Derrick Olzack's List of Records Received (3 pages)		
12	KK Derrick Olzack's Billing References (11 pages)		
13	LL Derrick Olzack's CV		
14	MM Coast Guard Investigative Service Case Management Report (DEF 5628)		
15	NN U.S. Department of Homeland Security United States Coast Guard Military Protective Orders and Memorandums (PLT 411-493, 496-497, 499-509, 778-782, 784, 801-805, and 849-850)		
16	OO Court History Report (DEF 5617)		
17	PP Fort Bragg Police Department Records (69 pages)		
18	QQ October 16, 2017, Fort Bragg Police Department Report (DEF 5612-5616)		
19	RR Audio Recording from Fort Bragg Police Department #FG1801615 (1 audio recording)		
20	SS Audio Recording from Fort Bragg Police Department #F201700364 (1 audio recording)		
21	TT Plaintiff Katherine Robles' Insurance Services Office Report (DEF 5569-5611)		
22	UU August 5, 2020, Geico Insurance Records (4 pages)		
23	VV May 12, 2021, Farmers Insurance Records (6 pages)		
24	WW October 15, 2021, Chula Vista Traffic Collision Report (4 pages)		
25	XX Collision Dynamics Records from March 5, 2022, (51 pages)		
26	YY April 26, 2022, letter from Collision Dynamics related to March 5, 2022, Claim (PLT 2506-2510)		
27	ZZ March 5, 2022, Aspire General Insurance Company Records (PLT 383-410)		
28	AAA May 13, 2022, State Farm Insurance Records Related to Claim Number 55-33Z2-27K (58 pages)		

1	BBB	October 17, 2022, State Farm Insurance Records Related to Claim Number 55-40R2-76V (PLT 368)		
2	CCC	October 18, 2022, Integon National Insurance Company Records Related to Claim Number 210516502-1 (41 pages)		
3	DDD	February 24, 2023, State Farm Insurance Records Related to Claim Number 55-46F3-62L (23 pages)		
4	EEE	March 14, 2023, State Farm Insurance Records Related to Claim Number 55-46T6-64S (14 pages)		
5	JJJ	May 5, 2023, Geico Insurance Records (5 pages)		
6	KKK	May 5, 2023, State Farm Insurance Records Related to Claim Number 55-49H9-91J (33 pages)		
7	LLL	September 26, 2023, State Farm Insurance Records Related to Claim Number 55-56S5-86M (100 pages)		
8	MMM	February 26, 2024, State Farm Insurance Records Related to Claim Number 55-44G4-36C (9 pages)		
9	NNN	March 5, 2018, Roseville Police Department Incident Report (DEF 77-78)		
10	OOO	March 31, 2018, Roseville Police Department Incident Report (DEF 79-80)		
11	PPP	August 17, 2018, Auburn Police Department Report (PLT 1-2)		
12	QQQ	November 7, 2018, Roseville Police Department Incident Report (DEF 81-82)		
13	RRR	November 16, 2018, Roseville Police Department Incident Report (DEF 83-84)		
14	SSS	December 11, 2018, Auburn Police Department Report (PLT 3-5)		
15	TTT	February 16, 2019, Roseville Police Department Incident Report (DEF 85-86)		
16	UUU	February 28, 2019/March 7, 2019, Auburn Police Department Report (PLT 6-7)		
17	VVV	March 10, 2019/March 11, 2019, Auburn Police Department Report (PLT 8-10)		
18	WWW	May 10, 2019, Auburn Police Department Report (PLT 11-12)		
19	XXX	June 19, 2019, Roseville Police Department Incident Report (DEF 87-88)		
20	YYY	July 8, 2019, Roseville Police Department Incident Report (DEF 89-90)		
21	ZZZ	August 27, 2019, Roseville Police Department Incident Report (DEF 91-92)		
22	AAAA	September 12, 2019, Roseville Police Department Incident Report (DEF 93-94)		
23	BBBB	September 18, 2019, CHP Arrest/Investigation		

1		Report (DEF 5618-5627)		
2	CCCC	October 8, 2019, Roseville Police Department Incident Report (DEF 95-96)		
3	DDDD	October 18, 2019, Roseville Police Department Incident Report (DEF 97-98)		
4	EEEE	November 8, 2019, Roseville Police Department Incident Report (DEF 99)		
5	FFFF	November 20, 2019, Roseville Police Department Incident Report (DEF 100-101)		
6	GGGG	December 18, 2019, Roseville Police Department Incident Report (DEF 102-103)		
7	HHHH	April 15, 2020, Roseville Police Department Incident Report (DEF 104-105)		
8	III	June 7, 2020, Roseville Police Department Incident Report (DEF 106-107)		
9	JJJJ	August 20, 2020, Roseville Police Department Incident Report (DEF 108-109)		
10	KKKK	September 7, 2020, Roseville Police Department Incident Report (DEF 110-111)		
11	LLLL	December 30, 2020, Roseville Police Department Incident Report (DEF 112-113)		
12	MMMM	February 20, 2021, Roseville Police Department Incident Report (DEF 114-115)		
13	NNNN	February 27, 2021, Roseville Police Department Incident Report (DEF 116-117)		
14	OOOO	March 18, 2021, Roseville Police Department Incident Report (DEF 118-121)		
15	PPPP	February 21, 2021, Roseville Police Department Incident Report (DEF 122-124)		
16	QQQQ	Chula Vista Police Department Call for Service from June 1, 2021, to July 22, 2022 (PLT 13-16)		
17	RRRR	July 18, 2022, San Diego Police Department Crime/Incident Report (5 pages)		
18	SSSS	July 18, 2022, San Diego Police Department Incident Report (PLT 1804-1806)		
19	TTTT	November 7, 2022, Los Angeles Police Department Investigative Report (7 pages)		
20	UUUU	November 7, 2022, -November 15, 2022, Los Angeles Police Department Investigative Report (PLT 1731-1734)		
21	VVVV	April 18, 2023, Los Angeles Police Department Incident Report (3 pages)		
22	WWWW	April 18, 2023, Los Angeles Police Department Investigative Report and Detective's Case Progress Log (6 pages)		
23	XXXX	April 18, 2023, Body Worn Camera Footage from		

1		Los Angeles Police Department (X60A8520M)		
2	YYYY	April 18, 2023, Body Worn Camera Footage from Los Angeles Police Department (X60A77661W)		
3	ZZZZ	Juvenile and Domestic Relations District Court, Fairfax County Records (PLT 33-120, 836-837, 854-856, and 2365-2404)		
4	AAAAA	Superior Court of California, County of Mendocino, Family Court Records (PLT 122-147, 171-251, 259, 303-321, 623-624, 629-630, 1697-1727, 2159-2231, and 2233-2244)		
5	BBBBB	Superior Court of California County of San Diego, Family Court Records (PLT 148-170 and 252-258, 586-590, 594-612, 620-622, 1683-1696, 2232, and 2245-2254)		
6	CCCCC	Superior Court of California, County of Placer, Family Court Records (PLT 322-363, 514-525, 529-568, 571-574, 577-582, 625-628, 631-649, 652-708, 725-774, 783, 785-797, 806-835, 839-848, 851-852, 857-929, 941-1018, 1026-1033, 1041-1128, 1166-1680, 1735-1736, 1743-1791, 1816-2081, 2256-2364, and 2418-2551)		
7	DDDDD	Superior Court of California, Count of Ventura, Family Court Records (PLT 583-585, 591-593, and 613-619)		
8	EEEEEE	Email Correspondence between Plaintiff and Coast Guard (PLT 498)		
9	FFFFF	September 6, 2018, Victim Impact Letter from Plaintiff Kathrine Robles (PLT 2405-2406)		
10	GGGGG	April 28, 2020, Letter from Katherine Robles (PLT 510-513)		
11	HHHHH	Email Correspondence from Plaintiff Kathrine Robles (PLT 2407-2418, 2422-2438)		
12	IIIII	February 15, 2018, Letter from Ashley Knapp (PLT 2439)		
13	JJJJJ	January 31, 2019, Carol I. Fox, MFT, Questionnaire (PLT 296-302)		
14	KKKKK	February 25, 2019, Carol I. Fox, MFT, Report and Recommendations (PLT 262-291 and 1086-1124)		
15	LLLLL	Placer County Emergency Response Referral Information Form (PLT 1129-1157)		
16	MMMMM	San Diego County Emergency Response Referral Information Form (PLT 1497-1501)		
17	NNNNN	Complaint filed in Superior Court of California, San Diego in Katherine Robles v. General Motors, LLC, et al (PLT 369-377)		
18	OOOOO	Victim Compensation Board Records (PLT 2449-		

1	2486)		
2	PPPPP	Notice of Unemployment Insurance Claim/Reward from Employment Development Department (PLT 17-32	
3	QQQQQ	August 4, 2017, Special Needs Enrollment Form for Plaintiff H.R. (PLT 1223-1232)	
4	RRRRR	July 3, 2019, Plaintiff H.R.'s education records from Growing Brilliant (PLT 1023-1024)	
5	SSSSS	July 9, 2019, Plaintiff H.R.'s medical records from Dr. Lothar Mader, PhD, (four pages)	
6	TTTTT	August 5, 2019, Plaintiff H.R.'s medical records from The Davis Group Counseling and Wellness Services (PLT 1021)	
7	UUUUU	August 6, 2019, Plaintiff H.R.'s medical records from Dr. Lothar Mader, PhD (PLT 1022)	
8	VVVVV	October 4, 2019, Misconduct Citation from Fiddymont Farm for Plaintiff H.R. (one page)	
9	WWWWW	Plaintiff H.R.'s academic records from Chula Vista Elementary School District (690 pages)	
10	XXXXX	Dr. Lothar Mader, PhD's handwritten notes regarding Plaintiff H.R. (seven pages)	
11	YYYYY	Plaintiff H.R.'s medical records from Optimal Neurofeedback (20 pages)	
12	ZZZZZ	Plaintiff H.R.'s medical records from Rocklin Family Practice and Sports Medicine from April 11, 2018, until February 19, 2021 (92 pages and PLT 930)	
13	AAAAAA	Plaintiff H.R.'s education records from Roseville City School District	
14	BBBBBB	Plaintiff H.R.'s education records from Sundown Elementary School	
15	CCCCCC	Plaintiff Katherine Robles' medical records from Mendocino Coast Clinics (206 pages)	
16	DDDDDD	Wisdom Pathway Institute Report (PLT 1456-1469 and 1792-1803)	
17	EEEEEE	Plaintiff Katherine Robles' records from Dr. Susan Pepperwood (nine pages)	
18	FFFFFF	Hope Transitional Records (PLT 2139)	
19	GGGGGG	April 6, 2020, Plaintiff Kathrine Robles' medical records from Michelle C. Evans, MSW, LCSW (PLT 2255)	
20	HHHHHH	Dean Riano POST Records (DEF 1878-1881)	
21	IIIII	Roseville Police Department Policies and Procedures (DEF 132-1773)	
22	JJJJJJ	Plaintiff Katherine Robles' Responses to City's Interrogatories Set One	

1 KKKKKK	Plaintiff Katherine Robles' Amended Responses to City's Interrogatories Set One		
2 LLLLLL	Plaintiff Katherine Robles' Supplemental Responses to City's Interrogatories, Set One		
3 MMMMMM	Plaintiff Katherine Robles' Responses to City's Interrogatories Set Two		
4 NNNNNN	Plaintiff Katherine Robles' Responses to Riano's Interrogatories, Set One		
5 OOOOOO	Plaintiff Katherine Robles' Responses to Riano's Interrogatories, Set Two		
6 PPPPPP	Plaintiff H.R.'s Responses to Riano's Interrogatories, Set One		
7 QQQQQQ	Plaintiff H.R.'s Responses to Riano's Interrogatories, Set Two		
8 RRRRRR	Plaintiff H.R.'s Responses to Riano's Interrogatories, Set Three		
9 SSSSSS	Plaintiff H.R.'s Supplemental Responses to Riano's Interrogatories, Set Two		
10 TTTTTT	Plaintiff Kathrine Robles' Responses to City's Requests for Admission, Set One		
11 UUUUUU	Plaintiff Kathrine Robles' Amended Responses to City's Requests for Admission, Set One		
12 VVVVVV			

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18 DATED: October 24, 2025

LAW OFFICES OF DALE K. GALIPO

19 /s/ Benjamin S. Levine
20 DALE K. GALIPO
21 BENJAMIN S. LEVINE
22 Attorneys for Plaintiffs23
24 DATED: October 24, 2025

PORTER SCOTT

25 /s/ Megan N. Boelter (as authorized 10/24/25)
26 WILLIAM E. CAMY
27 MEGAN N. BOELTER
28 Attorneys for Defendants